

EXHIBIT 117

Declaration of Anan Zhou

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF ANAN ZHOU

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I, Anan Zhou, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I graduated from The University of North Carolina at Chapel Hill (“UNC-Chapel Hill”) in 2016, where I double majored in Women’s and Gender Studies and Biology. I am currently pursuing a Master in Public Health at Columbia University.

2. I immigrated from China to the United States when I was four. I attended public school from kindergarten to twelfth grade in North Carolina, including the North Carolina School of Science and Mathematics, a statewide residential magnet school. Prior to attending UNC-Chapel Hill, the majority of my peers hailed from similar socioeconomic backgrounds as I did.

Experience at UNC-Chapel Hill

3. My interests at UNC-Chapel Hill focused primarily on biology research and qualitative studies, as well as a strong interest in interpersonal violence prevention. I was also interested in exploring concepts of identity, especially the identities I inhabited, in the context of the UNC-Chapel Hill campus, in the South and in the United States.

4. Before I declared my second major in Women’s and Gender Studies, I considered both the English and History departments. In my English courses, I was usually the only person of color. Approaching the literature, I often took a different

perspective than other students due to my own personal background, and was able to share these opinions with the class.

5. I took a Gender, Race, and Class course, with a very diverse class. The student composition impacted the conversation in the course significantly; our education was richer as my peers brought in their own lived experiences and we learned from each other. The ability to explore how concepts from the course can impact a person's life in an academic context was both incredibly important and productive. The diverse student makeup of the class allowed us to collectively approach difficult topics in a more comfortable environment. There was a sense of trust. When one is around peers that they are comfortable with and with whom one shares similar experiences and feels solidarity, they are often more enthusiastic in sharing their own thoughts and perspectives.

6. In one of my required courses for my Women's and Gender Studies major, I was particularly frustrated with the way my professor neglected to discuss the Asian-American experience. After discussing with other Asian-American students who felt similarly, we spoke to the faculty member as a group. As a result, she sought to rectify her oversight by devoting an entire class to Asian-American history and actions. Had I not first spoken to my fellow Asian-American students, I would not have felt comfortable enough to approach the professor. Had I not had the support of my peers, the entire class would not have been exposed to the course material the professor ultimately covered, nor would the professor have permanently altered their syllabus.

7. At UNC-Chapel Hill, I was actively involved in a student organization, Radical Asians (“Rad Asians”). This group was started my sophomore year with twelve other students. By my graduation, the organization had grown to sixty members. Rad Asians worked to fill a vacuum by addressing the lack of political organization in the Asian-American community at UNC-Chapel Hill. Collectively, we were interested in exploring what it means to be Asian-American in the South. We collected information and stories, organized actions and rallies, and discussed our different experiences growing up and the diversity inherent in the Asian-American experience. Especially in the context of the black and white racial paradigm, we felt it imperative to interrogate the stereotypes of Asian-Americans, and to define, in our own personal ways, what this label meant to us. Frequently challenged was the Model Minority myth, the false idea that Asian-Americans are high-achieving and in the upper or middle class, a belief that we had at some point all internalized, and struggled to shake loose. Prior to having this space to navigate the false messages I was receiving in American media, I often felt both confusion and emotional distress in living up to, as well as existing in contrast to these stereotypes.

8. Rad Asians also frequently worked with the Real Silent Sam Coalition, especially around the renaming of Saunders Hall. The real Silent Sam Coalition is a broad and diverse group of community members who hope to create honest public dialogue and provoke critical thought surrounding the monuments and buildings in Chapel Hill and Carrboro. Saunders Hall was a building on campus that had been named

after a Grand Wizard in the Ku Klux Klan. After, the Real Silent Sam Coalition raised awareness about this issue, the building was renamed to Carolina Hall. This activism allowed me to meet and work with students from many different backgrounds, including various racial and ethnic backgrounds. The struggle with UNC administration to rename Saunders Hall was a decade long difficult struggle. It was a change that would not have happened without black and brown students advocating for it. When you bring diversity, and different bodies to campus, the students can push the greater institution in the right direction.

9. One of the most striking moments of my college career was the murder of three Muslim Americans in my community, Razan Abu-Salha, her sister Yusor, and Yusor's husband Deah Barakat. Prior to this event, I had interacted many times with the Muslim Student's Association ("MSA) and had an opportunity to meet the students in the organization, as well as befriend many. MSA was integral in the response to the murder of these three members of the Chapel Hill community, an event (in 2015) that terrified students on campus, some who no longer felt safe to leave their room, or walk at night. The period of fear and grief was incredibly difficult for students in MSA, as well as other brown bodies on campus. In situations like these, it is the school's obligation to ensure the emotional and physical health of their students. However, I felt that MSA did the majority of the leg work, bringing the campus together, hosting a vigil, and calling for solidarity, unity and healing. It was not their responsibility to do so, but in opening an arena to openly mourn, grieve, and process the pain and trauma for the entire campus,

these students created an incredible sense of community, one that reached across the entire campus. Diverse bodies see and hold space for each other, often in a way that the University alone cannot.

10. I was very interested in the concept of knowledge through lived experiences at UNC-Chapel Hill. I grew up surrounded by people like myself, leading to the internalization of the belief that everyone who had immigrated to the United States from China had my same story—upper middle class, high-achieving, and first-generation. With a childhood rooted firmly in an upper-middle class background, and existing in an insular community where I mainly only interacting with people in the same socioeconomic bracket I do not believe I understood the severity and true impact of poverty until I met students at UNC from backgrounds other than mine. Nor do I believe this knowledge and understanding I now command is something I could have learned from a textbook or a classroom, but instead it was one I gained from befriending people who were willing to be open about their experiences, and discuss in great detail, how their upbringings contrasted from mine.

11. The most meaningful interactions I had at UNC-Chapel Hill were student-driven. In 2015, when issues arose around Silent Sam and the name of Saunders Hall, students of color called for a caucus. As a result, around eighty students gathered to discuss ‘what’ it meant to be a student of color on UNC Chapel hill’s campus. As we filed in, it became apparent that we were self-segregating by race and ethnicity, with pockets of Latino students next to pockets of Black students next to pockets of Indian

students next to pockets of Middle Eastern students. I self-segregated as well, surrounded by my East-Asian peers. There were many reasons for this. One was simply that we were sitting with our friends, looking for a bit of support in an environment that demanded openness and vulnerability. However, the self-segregation at the event came out of a recognition that our different racial identities led to different experiences and understandings of what it meant to be a person of color. As East Asian students, we will never know what it is to be Black in this country. I don't feel an innate fear for my life when I get pulled over by the police, nor do I know what it means to be racially profiled in public places, nor condescended to based on my skin color. Not in the ways that happen for my black peers. There were innate tensions at the caucus, the silent recognition of difference not all of us felt comfortable in voicing, that even when we band together, we don't all share the same things. However, I believe these tensions made the caucus richer, as it demanded more intention of everyone present, as we tried to address these tensions, as well as listen to each other's experience. Once again, this was completely student organized, not at all helped by the University.

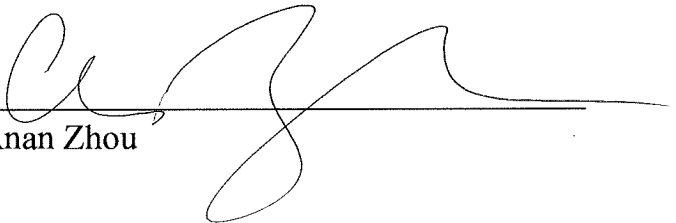
Conclusion

12. The diversity I experienced at UNC-Chapel Hill shaped and enriched my college experience. It provided me with an opportunity that I had never previously had to learn about people from backgrounds very different from my own. It played an important role in my own process of understanding and accepting my personal identity. It allowed me to find a meaningful community. Often, the force that lead to these lessons were

completely student driven, and without the richness of our UNC community in experience, background, religion, and race, I do not believe I would have gained the knowledge nor education I bear now. For all of these reasons, I support UNC-Chapel Hill's efforts to achieve a diverse student body across many dimensions, including race and ethnicity, because UNC-Chapel Hill's diversity is critical to the UNC-Chapel Hill experience.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: 9/25/2017



Anan Zhou